

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re

EAGLE PIPE, LLC,

Debtor.

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)  
) Chapter 11  
)

) Case No. 20-34879 (MI)  
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)  
)  
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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE  
OF ALL NOTICES, PLEADINGS, AND ORDERS**

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PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Boomerang Tube, LLC (“Boomerang”) and, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007, 9010, and 11 U.S.C. § 1109(b), requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders or other documents, filed or entered in this case, be transmitted to:

J. Benjamin King  
REID COLLINS & TSAI LLP  
1601 Elm Street, Suite 4200  
Dallas, Texas 75201  
Telephone: (214) 420-8900  
Facsimile: (214) 420-8909  
bking@reidcollins.com

Neither this request for notice nor any subsequent appearances, pleadings, claims, proofs of claim, documents, suits, motions, nor any other writings or conduct, shall constitute a waiver of Boomerang’s:

- a. right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge;
- b. right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated a legal or private right, or in any case,

controversy, or proceeding related hereto, notwithstanding the designation *vel non* of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether or not such jury trial right is pursuant to statute or the United States Constitution;

- c. right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. other rights, claims, actions, defenses, setoffs, recoupments, or other matters to which Boomerang is rightly entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved unto Boomerang without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: October 30, 2020

Respectfully submitted,

REID COLLINS & TSAI LLP

/s/ J. Benjamin King

J. Benjamin King (State Bar No. 24046217)

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COUNSEL FOR BOOMERANG TUBE, LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 30, 2020, a true and correct copy of the above Notice of Appearance was served via the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service.

/s/ J. Benjamin King

J. Benjamin King